

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

DENNIS HANSCOM, on behalf of himself and
all others similarly situated,

Plaintiff,

vs.

NORDSEC LTD., NORDSEC B.V., NORDVPN
S.A., NORD SECURITY INC., and TEFINCOM
S.A. d/b/a NORDVPN,

Defendants.

CASE NO. 3:24-CV-00277-KDB-DCK

**DECLARATION OF JURGITA BALTRAMIEJUNIENE IN SUPPORT OF DEFENDANT
NORDVPN S.A.'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Jurgita Baltramiejuniene declares as follows:

1. I am a director at Nordvpn S.A. I am competent to testify and make this declaration based on my personal knowledge.
2. I understand that this litigation involves claims that Nordvpn S.A. charged a customer in North Carolina for a recurring subscription to retail consumer VPN and related services, allegedly without the customer's consent. I further understand that the customer first subscribed to NordVPN and related services in August 2023.
3. Nordvpn S.A. is incorporated under the laws of the Republic of Panama, and its principal place of business is in Amsterdam, the Netherlands. Nordvpn S.A. offers the NordVPN, NordLocker, and NordPass retail consumer services, and operates nordvpn.com.
4. Nordvpn S.A. maintains its own funds in an independent account sufficient to operate its business.
5. Nordvpn S.A. is organized and governed by its own deed of incorporation and other corporate statutory documents, as a stand-alone entity.

6. Nordvpn S.A. is managed by its own board and holds its own shareholder meetings, as required.

7. Nordvpn S.A. accurately maintains its own business records, including financial records, minutes from shareholder meetings, corporate tax filings, and other corporate documents, such as the deed of incorporation and corporate resolutions.

8. Nordvpn S.A. shares one director with Tefincom S.A. Nordvpn S.A. does not otherwise share officers or directors with the other Defendants.

9. Nordvpn S.A. does not have offices, employees, contractors, or property in North Carolina.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 27th day of June, 2024.

_____*Jurgita Baltramiejuniene*_____

Director

Jurgita Baltramiejuniene